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December 23, 2025

**Public Version**

Special Master Helena C. Rychlicki  
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*VIA E-FILING and  
ELECTRONIC MAIL*

**Confidential Version Filed: December 23, 2025  
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Re: Qualcomm, Incorporated et al. v. Arm Holdings PLC,  
C.A. No. 24-490 (MN)

Dear Special Master Rychlicki:

On November 25 Qualcomm sought guidance as to whether it needed to advise Judge Noreika of the status of the parties' discovery disputes.<sup>1</sup> Qualcomm now writes to advise Your Honor of upcoming deadlines that were not discussed at that hearing and request that Your Honor address the pending discovery motions, including by scheduling a hearing on the pending third-party protective order motions.

The trial in this case is scheduled for March 9, 2026, with the pretrial conference scheduled for March 2 and the pretrial order due on February 23. D.I. 44 ¶¶ 12, 14. Under the local rules, Qualcomm is thus required to provide a draft pretrial order to Arm by January 23. D. Del. LR 16.3(d)(1). Exhibit and witness lists are part of the pretrial order and therefore Qualcomm must submit a draft of both on that date.

Qualcomm is eager to maintain the schedule. Certain of the currently pending discovery motions bear on those submissions, including on the exhibit and witness lists. These motions include:

- **Qualcomm's motion to amend:** On August 1, Qualcomm moved to amend the Complaint to name ARM Holdings plc and Arm Ltd. as individual defendants, instead of "Arm

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<sup>1</sup> 11/25/25 Hr'g Tr. at 127:18-129:12.

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Holdings plc. f/k/a Arm Ltd.” D.I. 360. This motion was fully briefed as of August 7 and was argued on August 14.

- **Third-party protective order motions:** Broadcom, MediaTek, Amlogic, Ampere,<sup>2</sup> Apple, Annapurna, and Analog Devices have all moved for protective orders to prevent production of their license agreements with Arm. D.I. 127, 323, 329, 374, 377, 386, 390. These motions were fully briefed by September 23. On October 21, as requested by Your Honor, the parties jointly proposed a schedule for a single hearing for each of these motions to be heard. 2025.10.21 Email from J. Ying.
- **Qualcomm’s first motion to compel:** On August 1, Qualcomm submitted its first motion to compel, presenting several disputes. D.I. 359. This motion was fully briefed as of August 7 and was argued on August 14. As agreed at that hearing, the parties each submitted supplemental letters on August 18 concerning the scope of Qualcomm’s claims, including peripheral IP and CPUs other than [REDACTED]. Importantly, because resolution of the scope issue will have implications for the third-party protective order motions, Your Honor reasonably concluded that the scope issue should be resolved first. 8/14/25 Hr’g Tr. at 64:16-65:12, 65:22-66:11.
- **Qualcomm’s second motion to compel:** On August 11, Qualcomm submitted its second motion to compel, raising several disputes. D.I. 375. This motion was fully briefed as of August 18 and was argued on August 22.
- **Qualcomm’s motion to strike:** On September 16, Qualcomm moved to strike the expert reports of Michael Brogioli and Steven Richards. D.I. 395. This motion was fully briefed as of September 23 and was argued on October 1.

Given the time it will take for the parties to conduct any discovery that Your Honor orders, or otherwise consider and brief any objections to those orders,<sup>3</sup> Qualcomm respectfully requests that Your Honor promptly schedule the hearing on the third-party motions and resolve the other pending motions, so that Qualcomm can comply with the Court’s schedule and the local rules.

Counsel is available should Your Honor have any questions.

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<sup>2</sup> Qualcomm notes that Ampere Computing LLC, was acquired by Arm’s majority owner SoftBank Group Corp. on November 25, 2025. *See* <https://group.softbank/en/news/press/20251126> (press release). Ampere accordingly no longer retains any independent, third-party interest in the confidentiality of the terms of its agreements (which may not even be operative since the acquisition).

<sup>3</sup> Under the Court’s July 18 Order, the parties have 21 days from the date of an order from the Special Master to file objections, with responses due within 10 days thereafter. D.I. 336 at 3.

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Respectfully,

*/s/ Jennifer Ying*

Jennifer Ying (#5550)

Words: 627

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cc: The Honorable Maryellen Noreika (via CM/ECF)  
Clerk of the Court (via hand delivery)  
All Counsel of Record (via CM/ECF)